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**BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF UTAH**

<p>UTAH INSURANCE DEPARTMENT,</p> <p style="text-align: center;">Complainant</p> <p>v.</p> <p>Real Advantage Title Insurance Company 640 North Tustin Ave, Suite 106 Santa Ana, CA 92075 NAIC No. 50440</p> <p style="text-align: center;">Respondent</p>	<p>STIPULATION AND ORDER</p> <p>Docket No. 2016-132 PC Enforcement Case No. 3845</p> <p>Brett Barratt, J.D. Deputy Insurance Commissioner Presiding Officer</p>
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STIPULATION

The Utah Insurance Department (“Department”), by and through its legal counsel, and Real Advantage Title Insurance Company, (“Respondent”), by and through its representative, hereby stipulate and agree as follows:

1. Respondent is a foreign title insurer whose business address is 640 North Tustin Ave, Suite 106, Santa Ana, CA. 92075. Respondent’s NAIC number is 50440.
2. The Department has jurisdiction over the parties and subject matter of this administrative action.

3. Respondent acknowledges notice of agency action pursuant to Utah Code § 63G-4-201; acknowledges that this Stipulation and Order is an informal proceeding pursuant to Utah Code § 63G-4-202; and irrevocably waives the right to any hearing, review or appeal concerning this matter.

4. Respondent has the right to be represented by legal counsel and waives this right by either having sought the advice of legal counsel or by having voluntarily chosen not to do so.

5. This signed Stipulation, along with any Findings of Fact and Conclusions of Law, shall not be subject to any reconsideration, renegotiation, modification, hearing or agency review or appeal.

6. The Findings of Fact and Conclusions of Law presented below are accepted by the parties.

7. The issuance of the signed and adopted Order proposed below is solely for the purpose of disposing of the specific matter entitled herein.

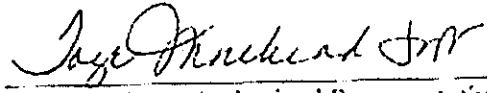
8. The only promises, agreements and understandings that the parties have regarding this matter are contained in this Stipulation.

9. Respondent enters into this Stipulation voluntarily, knowingly, and free from any coercion of any kind.

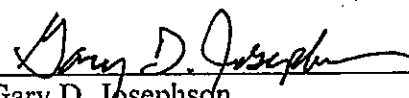
10. The persons signing this Stipulation on behalf of the named parties hereby affirm that they are authorized to sign and bind the parties.

(Signatures Follow)

Dated this 26th day of January, 2017.


Tommye Frost, Authorized Representative
REAL ADVANTAGE TITLE INSURANCE COMPANY

Dated this 30th day of January, 2016.


Gary D. Josephson,
Assistant Attorney General
UTAH DEPARTMENT OF INSURANCE

Based upon the foregoing Stipulation and Department file, the Presiding Officer makes the following Findings of Fact:

FINDINGS OF FACT

1. In November, 2015, the Department identified a list of title producers that had reinstated their licenses during the month of September, 2015 and determined that the license of real Advantage Title Insurance Agency had lapsed on November 14, 2014, with a reinstatement date of September 29, 2015.
2. The Department also found that Respondent had no active producer associations and/or appointments listed.
3. The Department found that, even though Respondent did have a licensed agency in Utah, Respondent failed to use it; instead, Respondent conducted Utah title and escrow business out of its California main office.

4. The Department found that Respondent had conducted 189 closings and issued 465 commitments on its behalf utilizing agencies and producers not licensed in Utah.

5. Respondent took responsibility for, and corrected, all violations in a timely manner.

Based upon the foregoing Findings of Fact, the Presiding Officer makes the following Conclusions of Law:

CONCLUSIONS OF LAW

1. In violation of Utah Code § 31A-23a-302 and 31A-23a-103(1)c, Respondent utilized Utah non licensed/designated producers to conduct escrow and issue title commitments on its behalf.

2. In violation of Utah Code § 31A-14-211, Respondent conducted 189 escrow closings and issued 465 title commitments on its behalf, without utilizing its licensed agency in Utah. Also, under the referenced statute, Respondent may only insure property in Utah through a licensed agency or its own bona fide office in Utah, of which Respondent did not have.

3. Through its actions, Respondent violated Utah Code Sec. 31A-23a-402 by engaging in unfair methods of competition.

Based on the Findings of Facts and Conclusions of Law, that presiding officer makes the following Order:

ORDER

Respondent Real Advantage Title Insurance Company is hereby assessed an

administrative forfeiture in the amount of \$63,955.00, which full amount is to be paid to the Department within thirty (30) days of the signing of this Order.

Dated this 30th day of January, 2017.

TODD E. KISER
INSURANCE COMMISSIONER




Brett Barratt, J.D.
Deputy Insurance Commissioner
Presiding Officer

TITLE AND ESCROW COMMISSION CONCURRENCE

Pursuant to Utah Code Sec. 31A-2-404(1)(b) and by a vote of 3 to 0, taken in open meeting on this date, the Utah Title and Escrow Commission hereby concurs with the Order of the Presiding Officer.

Dated this 13th day of February, 2017.



David Moore, Chairman
Title and Escrow Commission

NOTIFICATION TO RESPONDENT

You are hereby notified that a failure to obey an Order of the Commissioner may subject you to further penalties, including forfeitures of up to \$5,000 per violation and the suspension or revocation of your license and the filing of an action in district court, which may impose forfeitures of up to \$10,000 per day for continued violation.

You are further notified that other jurisdictions in which you may be licensed may require that you report this action to them.

**UTAH
Invoice**

Page 1

Printed Date: February 13, 2017

Invoice Date: February 13, 2017
Balance Due: \$63,955.00
Due Date: March 15, 2017
Invoice ID: 925068

REAL ADVANTAGE TITLE INSURANCE COMPANY
1551 N TUSTIN AVE
SANTA ANA CA 92705

Item Description	Amount
Monetary Penalty Company	\$63,955.00
Original Amount Due	\$63,955.00
Payments Received	
	Balance Due

**UTAH
Invoice**

Printed Date: February 13, 2017

Invoice Date: February 13, 2017
Balance Due: \$63,955.00
Due Date: March 15, 2017
Invoice ID: 925068

Make checks payable to: Utah Insurance Department

Send payment to:

Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114-6901

Detach and Return with Payment

CERTIFICATE OF MAILING

I do hereby certify that on this date, I mailed by U. S. first class mail, postage prepaid, and by electronic mail, a true and correct copy of this STIPULATION AND ORDER to the following:

**TOMMYE FROST
REAL ADVANTAGE TITLE INSURANCE COMPANY,
640 N TUSTAN AVE, STE 106
SANTA ANA CA 92075**

tommycf@octitle.com

Feb 13/17.
Date


Jeanne Mitchell
Utah Insurance Department
State Office Building Room 311
Salt Lake City UT 84114
Telephone (801) 538-3800